



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
OFFICE OF THE DEPUTY CHIEF OF STAFF FOR PERSONNEL
WASHINGTON, DC 20310-0300



July 12th, 1999

Army Records Management

Regulation Comment Desk (NPOL), Room 4100,
National Archives and Records Administration
8601 Adelphi Road,
College Park, MD 20740-6001

Dear Ms. Nancy Allard:

Thank you for the opportunity to comment on the proposed new rules for the storage of Federal Records and storage standards for Federal Records Centers. However, the Army must nonconcur with your proposal at this time. We recommend that a single standard be used to measure the suitability of a records storage facility regardless of whether the facility is government owned or a commercial enterprise.

While the Department of the Army is wholeheartedly in favor of improving the standards for all Records Centers that contain Federal records, we feel the current approach as outlined by NARA in these proposed rules is unsatisfactory. By requiring these new stringent standards be imposed on commercial records storage and servicing providers immediately, while exempting existing NARA facilities for ten years, appears to favor maintaining the status quo. It is our contention that a more prudent and proactive course of action would be to utilize the safest environment currently available, including existing commercial providers, rather than wait until NARA owned facilities can be brought in to compliance. For that reason, the Department of the Army non-concurs on the proposed storage rules for Federal Records and storage standards for Federal Records Centers as written.

My point of contact Mr. Thomas Campbell may be reached at 703-695-9706.

Sincerely,

ROBERT D. BUCKSTAD
Colonel, U.S. Army
Director, Information Management Office

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Army Records Management and Declassification Agency, ATTN: Mr. Greenhalgh